

Message

From: Bill Anderson [Personal Email / Ex. 6]
Sent: 2/26/2019 7:13:10 PM
To: Rice, Scott [Rice.Scott@epa.gov]
Subject: Re: Pennsylvania Title 25 chapter 271.914(b), in violation of EPA regulations

Good afternoon Mr Rice,

Have you had any luck regarding the Pennsylvania state Bio Solid PCB limits exceeding 2ppm level?

Thank you,
Bill Anderson

Sent from my iPhone

On Jul 31, 2018, at 10:09 AM, Rice, Scott <Rice.Scott@epa.gov> wrote:

Good morning Mr. Anderson. I wanted to follow up with you on your question. I have been researching some information regarding Synagro's application as you referred to in your e-mail below. I am also coordinating with some of our bio-solids experts here at the agency so I can give you a definitive answer.

May I ask how you may be associated with Coplay Aggregates and how your attention came to the Notice of Non-compliance that was sent to them? I am assuming you are a concerned resident next to the farm where the land application is slated for.

As I indicated earlier, I am coordinating with our biosolids contacts here at the agency to try to determine the relationship between the PADEP code and how TSCA, RCRA and the CWA relates in regards to allowable PCBs concentrations.

I just wanted to send you this email to let you know I am still working on it and hope to have an answer for you soon. Best regards

From: Bill Anderson [Personal Email / Ex. 6]
Sent: Tuesday, July 24, 2018 3:49 PM
To: Rice, Scott <Rice.Scott@epa.gov>
Subject: Re: Pennsylvania Title 25 chapter 271.914(b), in violation of EPA regulations

Think any action could be taken or is this not a current concern?

Sent from my iPhone

On Jul 23, 2018, at 8:23 AM, Rice, Scott <Rice.Scott@epa.gov> wrote:

God morning Mr. Anderson. I wanted to let you know I got your email this morning and I am looking into the information you attached below. After I take a look at the issues, I will contact you to discuss your concerns. regards

From: Bill Anderson [Personal Email / Ex. 6]
Sent: Friday, July 20, 2018 11:26 AM
To: Rice, Scott <Rice.Scott@epa.gov>
Subject: Fwd: Pennsylvania Title 25 chapter 271.914(b), in violation of EPA regulations

Looping you into this question Mr. Rice

----- Forwarded message -----

From: **Bill Anderson** **Personal Email / Ex. 6**

Date: Fri, Jul 20, 2018 at 11:22 AM

Subject: Pennsylvania Title 25 chapter 271.914(b), in violation of EPA regulations

To: <Daw.harry@epa.gov>, Michael DeLuca **Personal Email / Ex. 6**

Mr. Daw,

I see your name was attached to the NOV filed against the Coply Quarry in Whitehall township Pennsylvania for exceedance of EPA PCB limits.

I would like to bring your attention to the Pennsylvania Title 25 chapter 271.914 (b). This deals with the pollution limits for treated Bio Solids that are land applied in the state of Pennsylvania.

<https://www.pacode.com/secure/data/025/chapter271/s271.914.html>

the link the PA Code is above.

As you can see both the table 1 and table 3 clearly exceed the EPA limits for PCBs.

I currently have a farm In very close proximity to my house that is applying to allow Synagro to land apply these treated bio-solids.

They only appear to test for the 10 things in the regulations which blows my mind. They also don't appear to run TCLP analysis on anything where they probably should especially for the stuff falling under the Table 1 limits that is not containerized but delivered in bulk.

I asked if there was analysis available for me to review from the source of the bio solids that are to be land applied near my property. The answer I received is that the law does not require the provider, in this case synagro, to disclose where they are acquiring the material from. So there-fore I would have to file a right to know request with the state of Pennsylvania, Mass, and DE for every single one of their possible sources in order to get my hand on data and at that point I would still have no way to pinpoint if the data has screaming levels of lead or PCBs.

Does Synagro have to report their data to the EPA when they test it?

Thank you,
Bill Anderson